

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE RIVERKEEPER, INC.,

PLAINTIFF,

vs.

CITY OF LEBANON, TENNESSEE,

DEFENDANT,

Case No. 3:23-CV-01369

**JOINT MOTION FOR EXTENSION OF AUGUST 12, 2025 DEADLINE TO MAKE
NECESSARY FILINGS TO TERMINATE ACTION**

Defendant City of Lebanon, Tennessee (“Lebanon”) and Plaintiff Tennessee Riverkeeper, Inc. (“Riverkeeper”) (collectively, the “Parties”) hereby move to extend the August 12, 2025 deadline for making the necessary filings to terminate this action by thirty (30) days, through and including **September 11, 2025**. Good cause exists for the requested extension:

1. On May 13, 2025, the Parties filed a Notice of Settlement and Motion to Stay, advising the Court that they reached a settlement in principle of all claims and asking the Court to stay all case-related deadlines to conclude the settlement process. *See* D.E. 34.

2. On May 14, 2025, the Court granted the Parties’ Motion to Stay and set a deadline of August 12, 2025 for making the necessary filings to terminate the action. *See* D.E. 36.

3. The Parties’ settlement agreement includes injunctive relief, which will be memorialized in a proposed Consent Decree. The Parties agreed on the scope of the injunctive relief in May 2025, and in June and July 2025 the City worked on completing the agreed-upon remedial actions. The City completed the work in early August 2025.

4. Given the City's recent completion of the remedial actions, the Parties require additional time to finalize their proposed Consent Decree.

For the foregoing reasons, the Parties respectfully request that this Court grant their Motion and extend their deadline for making the necessary filings to terminate this action by thirty (30) days, through and including September 11, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below:

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